

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

Chasity Congious, by and through)	
her Guardian, Kimberly Hammond,)	
on behalf of herself and as Mother and)	
Next Friend of Z.C.H., Deceased,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:22-cv-00092-O
)	
City of Fort Worth, et al.,)	
)	
Defendants.)	

**APPENDIX IN SUPPORT OF PLAINTIFF'S REPLY BRIEF FOR
MOTION FOR RELIEF FROM JUDGMENT**

Dated: May 7, 2024

Respectfully submitted,

/s/ Jarrett Adams
Jarrett Adams, Esq.
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Attorney for Plaintiff

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**DECLARATION OF JARRETT ADAMS IN SUPPORT OF
PLAINTIFF'S REPLY BRIEF FOR MOTION FOR RELIEF FROM JUDGMENT**

1. I am one of the attorneys for Plaintiff in the above-captioned case.
2. I make this declaration in support of Plaintiff's reply brief for motion for relief from judgment.
3. Prior to commencing this case, Plaintiff's counsel sought and obtained Chasity Congious's medical records from JPS Health Network, including but not limited to records pertaining to Chasity Congious giving birth at the Tarrant County Jail on May 17, 2020. The email to Defendant Dr. Aaron Ivy Shaw on May 17, 2020 at 7:29 AM was not included in the medical records produced to Plaintiff's counsel by JPS Health Network.
4. Prior to commencing this case, Plaintiff's counsel sought and obtained records via an open records request to the Tarrant County Sheriff's Office ("TCSO") for records pertaining to Chasity Congious giving birth at the Tarrant County Jail on May

17, 2020. The email to Defendant Dr. Aaron Ivy Shaw on May 17, 2020 at 7:29 AM was not included in the records produced to Plaintiff's counsel by the TCSO.

5. Defendant Tarrant County disclosed its responsive expert designations on November 13, 2023.

6. I had a two-week trial in the Southern District of New York in January 2024.

7. I was on paternity leave in March and April 2024 due to the birth of my first child.

Pursuant to Title 28, United States Code Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 7, 2024

Respectfully submitted,

/s/ Jarrett Adams

Jarrett Adams, Esq.

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2024, I electronically filed the foregoing pleading with the United States District Court for the Northern District of Texas using the CM/ECF system, which will automatically serve a true and complete copy upon all counsel of record.

/s/Jarrett Adams
Jarrett Adams, Esq.